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March 31, 2015

VIA ECF

Magistrate Judge Ramon E. Reyes
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Sebahat Koci v. Beebo, Corp., et al.
Case No.: 14-cv-0688 (NGG) (RER)

Dear Judge Reyes:

As you are aware, we represent Plaintiff in this matter. We write Your Honor to respectfully move the Court for an Order: 1) precluding non-party witnesses Mahmoud Boutarki and Jason Villafare from testifying at trial, or in the alternative, compelling them to appear for their depositions, pursuant to Your Honor's February 4, 2015 Order; and 2) compelling Lutheran Medical Center - Sunset Terrace to comply with the subpoena for Plaintiff's medical records.

First, pursuant to the February 4th Order, depositions had been scheduled for March 10, 2015 at 10:00 a.m. and 12:00 p.m., respectively, at Your Honor's Jury Room, Room N204, but these non-party witnesses failed to appear. Documents attesting to same, which were served pursuant to the Order, have been annexed hereto.

Second, despite your movant's subpoena, Sunset Terrace has failed to provide any of Plaintiff's medical records. Indeed, in their November 5, 2014 response, Sunset Terrace's representative responded, "Subpoena has to have a judge's signature."

Therefore, we respectfully move the Court for an Order: 1) precluding these witnesses from testifying at trial, or in the alternative, compelling these non-party witnesses to appear for depositions pursuant to Your Honor's prior Order; 2) compelling Sunset Terrace to comply with your movant's subpoena; and for such other and further relief this Court deems just and proper.

Respectfully submitted,
ARCE LAW GROUP, P.C.

/s/
Erdal Turnacioglu, Esq.

cc (via ECF): Aaron Goldsmith, Esq. (attorney for Defendants)